Full Equality Impact Assessment (EqIA)

## Skills Development Scotland has a legal duty to consider the impact of any new ‘policy’ on equality groups. A ‘policy’ in this context is taken to mean any new activity, function, policy or product, essentially anything that SDS does. Assessing impact includes considering relevant evidence, including evidence received from equality groups and the likelihood of a positive or negative impact on equality groups of introducing that new product, project or policy. The final section of this form requires us to think about how negative consequences can be mitigated against or removed, and how potential positive impacts can be encouraged. Equality impact assessment helps SDS meet its obligations under the Equality Act 2010. In addition, SDS took the decision to use the impact assessment process to make progress as a Corporate Parent in relation to care experienced young people, which is a component part of the Children and Young People (Scotland) Act 2014. The process might also be used to consider other groups that SDS has evidence of experiencing discrimination or underrepresentation.

For more detailed information about equality impact assessment, please see EHRC guidance here:

<https://www.equalityhumanrights.com/en/publication-download/assessing-impact-and-public-sector-equality-duty-guide-public-authorities>

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| --- | --- |
| **Name of EqIA** (e.g. directorate, large project or service) | Skills Planning and Sector Development – NTTF Tourism programme, Tourism and Hospitality Talent Development Programme (THTDP) |
| **Senior Responsible Officer (SRO):** name and job title | Chris Brodie – Director of Regional Skills Planning and Sector development |
| **Does your project link to any other** [**published EqIAs**](https://www.skillsdevelopmentscotland.co.uk/publications-statistics/publications/?page=1&topic%5b%5d=3-6&order=date-desc)**?**If so please provide the name of the EqIA (e.g. WBL) | No |

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| **Approved by:** | **Director of:** | **Date approved:** | **Review date:** |
| Signed:  | Director of Regional Skills Planning and Sector Development | 23/09/2021 | N/A |

1. **Purpose of project, policy or product**

Provide details of what is being impact assessed below, including the target audience for this project:

This proposal seeks to develop COVID resilience within the tourism sector and support the response and recovery to the pandemic through an industry led skills development programme. It is building upon the successful Tourism and Hospitality Talent Development Programme (THTDP) funded through the Scottish Government National Transition Training Fund in 2020/21 which has put 1900 sector staff through a programme of supervisory, management and leadership training.

Specific aims include:

* Providing increased support for tourism employers to retain, upskill, engage, and motivate talented and committed staff and reduce redundancies across the sector.
* Enhance recruitment opportunities for businesses by developing the people management skills within the sector.
* Enhance recruitment opportunities for displaced workers from other COVID impacted sectors within the economy.
* Help to address skills shortages the sector will face following recovery from the pandemic.
* Support tourism businesses to access training from providers of high-quality training for staff at risk of redundancy.
* Develop the meta skills of employees within the sector developed to allow them to thrive in the workplace of the future.
* Increase awareness raising and support for tourism businesses to implement the principles of fair work.
* Help to address the increasing issues of poor mental health and wellbeing amongst staff within the tourism sector and increase the motivation of staff.
* Support training and development activity directly related to achieving the objectives identified within the Scotland Outlook – 2030 Tourism Strategy and the Tourism Taskforce recommendations.
* Improve the carbon literacy of staff within the sector, raise awareness of the climate emergency facing the sector and support managers and staff to implement actions to reduce their carbon footprints and the footprints of their businesses.

The outcomes of the project will be:

* Up to 1500 tourism staff undertaking a tailored, blended learning, supervisory, management and leadership programme. The content has been designed to build on and enhance the experience of managers at these levels, providing new skills, insights, tools and techniques, to allow them to get the best performance from themselves and the rest of their team.
* Key aspects of the content will include:
* An 8 Module programme of supervisory training.
* A 6 Module programme of management training
* A 6 Module programme of leadership training

In addition, a series of stand-alone modules will be made available for the sector based on feedback from phase 1 of the programme which will cover:

* Leading by example e.g. self-awareness, assertiveness, behavioural styles, emotional intelligence.
* Decisiveness e.g. Time management, problem solving, delegation
* Leadership skills e.g. employee engagement, crucial conversations, conflict management.
* Managing performance e.g. Influencing and inspiring others, elements of effective feedback.
* Driving for results e.g. vision and values, action planning and prioritisation
* Strategic thinking e.g. Innovation and creativity, change management.

The programme will also embed awareness raising around issues relating to the climate emergency, equalities and diversity, and fair work. Given the importance of the sector addressing these issues, distinct programmes will also be required within the programme to increase knowledge and understanding within the sector of these issues, and these are highlighted below.

* Up to 350 individuals undertaking a Carbon Literacy programme of training raising awareness and understanding of the climate emergency and identifying practical actions for themselves and their businesses to reduce their carbon footprint.
* Up to 350 managers, leaders, and supervisors will participate in a programme of equalities training to champion, promote and support a more diverse workforce across the tourism sector in Scotland. Content will include legislative responsibilities but also highlight good practice in developing and supporting a diverse workforce.
* A programme to promote the principles of fair work to businesses across the sector and signposting them to further support to assist them in implementing these principles within their businesses. This programme will raise awareness of fair work and encourage and support businesses to address the five principles. It will aim to demonstrate the values and impacts of fair work and support employers to extend and develop their fair work practices. To avoid duplication this programme will link closely to the existing work around fair work of the Fair Work Convention, Enterprise Agencies, Poverty Alliance and Hoteliers Charter.

This will run until 31 March 2022, hence there will not be a review date of this EqIA. This will be reviewed if there are future projects of a similar natur, the project is extended, or significant changes made.

1. **Evidence and Impact**

This section should consider the impact of your large project/directorate on each of the equality groups in turn. The [Equality Evidence Review](https://skillsdevelopmentscotland.sharepoint.com/sites/IShare/Connectcontent/Resource%20Library/Forms/NotArchived.aspx?id=%2Fsites%2FIShare%2FConnectcontent%2FResource%20Library%2FHR%20%5E%2FCulture%20and%20Standards%2FEquality%2C%20Diversity%20and%20Inclusion%2FEquality%20Mainstreaming%20report%5FEquality%20Evidence%20Review%5FJune%202019%2Epdf&parent=%2Fsites%2FIShare%2FConnectcontent%2FResource%20Library%2FHR%20%5E%2FCulture%20and%20Standards%2FEquality%2C%20Diversity%20and%20Inclusion&p=true&cid=90e8ed31-d77d-4e91-9365-940facfb6e8e) has information on school, Further/Higher education and employment for different groups. Think about the **actions** required. They will be collated on the action plan in the next section. Please add rows, as required.

Each section should include:

* **a context** – outlining how your project/service relates to this protected characteristic, e.g. population statistics
* **evidence of positive or negative impact** – outlining the potential disadvantage or barriers faced by this equality group
* **source of evidence** – evidence used, including any consultation
* **activity to date** – outlining what we have already done to address disadvantage or promote equality
* **further activity required** – outlining what we’ll do to proactively promote equality and address any potential barriers
	1. **Age**

**Context:** An ageing workforce in Scotland raises the possibility of discrimination, with older workers less likely to be supported through upskilling and reskilling opportunities compared to younger colleagues. This programme aims to support workers of all age within the tourism workforce to upskill.

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| Potential positive – programme available to people of all ages and applications to be encouraged from people of all ages.The anticipated wide range of ages on the programme (as in phase 1 of the programme) provides great opportunities for participants to share knowledge and experience within the sector and develop mentoring relationships.The programme provides an opportunity to promote modern apprenticeships and graduate apprenticeship programmes to people of all ages working within the sector.Whilst 30% of the workforce are under 24 the overall workforce is aging and requires upskilling to adopt to the changing workplace post COVID.The management/leadership element of the programme will include a focus on equity/diversity training and will include an increased understanding of the needs and expectations of employees of different ages. | Phase 1 of the programme delivered in 2020/21 had 1900 participants. 1788 participants were aged 25+ and included 600 aged 40 and over. 212 16-24 year olds also received support reflecting the need to support younger talent within the workplace.The Tourism Skills investment Plan reports that around 30% of the tourism workforce are aged under 24. The national tourism strategy Scotland Outlook 2030 puts a strong emphasis on attracting and retaining a more diverse workforce including older workers | Phase 1 of the THTDP delivered from January to April of 2021 to 1900 tourism employees of all ages.Strong emphasis on developing a more diverse workforce embedded within the national Tourism Strategy, Outlook Scotland 2030.Discussions between the Tourism Skills group and Age Scotland around support for employers to employ older workers (50+) | Scottish Tourism Alliance and HIT Scotland to work with businesses across the sector to ensure equality of access to the programme for people of all ages.Scottish Tourism Alliance and HIT Scotland to work with SDS Sector manager and SDS Equalities team to ensure the correct messages around age are communicated within the programme and when promoting the programme.On-going monitoring of participant data regarding age throughout the delivery of the programmeWork with Mar Comms team within SDS to ensure all communications regarding the programme are appropriate with regard to age.Ensure providers of the programme are fully compliant with equalities legislation. |

* 1. **Disability**

**Context:** Disabled people generally have poorer employment outcomes and are more likely to go into Further Education after school. Disabled people are more likely to be unemployed or under-employed than their peers, for example a disabled person with a degree is more likely to be unemployed than a non-disabled person without a degree.[[1]](#footnote-2) Within the Tourism sector there is currently no data available on the current workforce relating to disability.

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| Positive impact – as the programme will be delivered on-line this will remove many potential barriers for people with disabilities.  | [Equality Evidence Review](https://www.skillsdevelopmentscotland.co.uk/media/47777/1329_equality-evidence-review-2021.pdf) | On phase 1 of the THTDP delivered 2020/21 42 people with disabilities took part in the programme (2.1%). It is possible though that some people with disabilities chose not to identify as being disabled.For participants with ADHD, Dyslexia, Visual and hearing Impairments, modifications were made including:● Course details provided prior to each session ● No new written material was introduced during the sessions. ● The trainers contacted participants to offer support could provide. ● The course materials were produced in monochrome for those with colour deficiency● Sessions were delivered with closed captions.● Recording of sessions so that participants could review it at their leisure. | Scottish Tourism Alliance and HIT Scotland to work with businesses across the sector to ensure equality of access to the programme for people with disabilities.Scottish Tourism Alliance and HIT Scotland to work with SDS Sector manager and SDS Equalities team to ensure the correct messages around disability are communicated within the programme and when promoting the programme.On-going monitoring of participant data regarding disability throughout the delivery of the programmeWork with Mar Comms team within SDS to ensure all communications regarding the programme are appropriate with regard to disabilityEnsure that the programme providers are fully compliant with equalities legislation with regard to disabilities. |
| The management/leadership element of the programme will include a focus on equity/diversity training and will include an increased understanding of the support needs of people with disabilities and practical support employers can put in place to provide equitable opportunities in the workplace. |  | Discussions with Kelvin College on development of a pilot programme supporting people with disabilities in the workplace building on the Lemon Tree Hotel model of workforce development and support. | To use best practise from these discussions to influence the programme |

* 1. **Gender reassignment** (sometimes under heading of Transgender)

**Context:** This section looks at activity to address potential disadvantage faced by trans[[2]](#footnote-3) customers. For the trans community, there is little data available on employment outcomes. However, we know that trans people are less likely to be in employment than their peers. The Scottish Government estimates that around 0.6-1% of the population is transgender.

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| For this group the impact could be positive as delivery is on-line and not in a physical location | Evidence is limited on the experience of work for trans workers. A survey conducted by Stonewall (2020) of LGBT workers reported that trans workers are more likely to experience harassment and discrimination than the wider LGBT population, with 39% reporting negative comments or conduct from colleagues and 6% reporting being physically attacked in the workplace. | Delivery of phase 1 of the THTDP in 2020/21. Individuals were given the opportunity to identify as Transgender although none of the participants did so. | Scottish Tourism Alliance and HIT Scotland to work with businesses across the sector to ensure equality of access to the programme for people identifying as Transgender..Scottish Tourism Alliance and HIT Scotland to work with SDS Sector manager and SDS Equalities team to ensure the correct messages around transgender are communicated within the programme and when promoting the programme.On-going monitoring of participant data regarding transgender throughout the delivery of the programmeWork with Mar Comms team within SDS to ensure all communications regarding the programme are appropriate with regard to people identifying as transgender.Ensure that the programme providers are fully compliant with equalities legislation with regard to people identifying as transgender... |
| If gender options not available on eligibility or application forms, may feel not included | [Stonewall (2020) Shut Out](file:///C%3A%5CUsers%5CBruceia%5CDocuments%5CStonewall%20%282020%29%20Shut%20Out) | N/A | * Ensure inclusive monitoring forms (including “in another way”)
 |
| If trainer is not aware of trans issues, trans people may feel not included  | [Stonewall (2020) Shut Out](file:///C%3A%5CUsers%5CBruceia%5CDocuments%5CStonewall%20%282020%29%20Shut%20Out) | N/A | 1. Ensure trainer has done trans inclusive training and is aware of best practice in delivering to diverse groups.
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* 1. **Marriage and civil partnership**

**Context:** As far as we are aware no data on marriage and civil partnership is available in current the current **tourism** workforce. Therefore, it is not possible to fully assess whether individuals falling under this protected characteristic face any barriers or discrimination accessing **THTDP**

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| None | None | None | None |
|  |  |  |  |

* 1. **Pregnancy and maternity**

**Context:** As far as we are aware no data on pregnancy and maternity available in the tourism workforce.Therefore, it is not possible to fully assess whether individuals falling under this protected characteristic face any barriers or discrimination in accessing upskilling/reskilling as part of the THTDP.

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| As the programme will be delivered on-line this will remove potential physical barriers that mey be experienced relating to pregnancy and maternity/paternity. | [EHRC Pregnancy and Maternity Discrimination Research](https://www.equalityhumanrights.com/en/managing-pregnancy-and-maternity-workplace/pregnancy-and-maternity-discrimination-research-findings) | None | Ensure that the programme providers take account of the needs of any participants relating to pregnancy or other issues relating to maternity/paternity. |
|  |  |  |  |

* 1. **Race**

**Context:** The Scottish Government Race Equality Framework states that despite high attainment at school and rates of entry into further and higher education after school, statistically, ethnic minority people are not receiving the labour market advantages which should be expected from their positive educational outcomes (also see EHRC 2018a). There is no data relating to BAME individuals within the tourism workforce.

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| Whilst recognising that BAME are disadvantaged in the labour market, this programme is designed to provide upskilling opportunities for staff within the tourism workforce regardless of ethnicity. The on-line nature of the programme is designed to remove all barriers to participation and support will be provided to all participants who require additional support. | [Equality Evidence Review](https://www.skillsdevelopmentscotland.co.uk/media/47777/1329_equality-evidence-review-2021.pdf) | On Phase 1 of the THTDP delivered in 2020/21 77 individuals (4%) identified as coming from within the BAME community.Strong emphasis on developing a more diverse workforce embedded within the national Tourism Strategy, Outlook Scotland 2030.  | Scottish Tourism Alliance and HIT Scotland to work with businesses across the sector to ensure equality of access to the programme for people identifying as BAME.Scottish Tourism Alliance and HIT Scotland to work with SDS Sector manager and SDS Equalities team to ensure the correct messages around BAME are communicated within the programme and when promoting the programme.On-going monitoring of participant data regarding BAME throughout the delivery of the programmeWork with Mar Comms team within SDS to ensure all communications regarding the programme are appropriate with regard to people identifying as BAMEEnsure that the programme providers are fully compliant with equalities legislation with regard to people identifying as BAME. |

* 1. **Religion or belief**

**Context:** As far as we are aware no data on religion or belief available in the tourism workforce.Therefore, it is not possible to fully assess whether individuals falling under this protected characteristic face any barriers or discrimination in accessing upskilling/reskilling as part of the THTDP

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| The flexible on-line nature of the programme is designed to remove barriers to participation for all groups within the workforce regardless of religion or belief. Online learning will ensure that learning is flexible enabling individuals to access at a time that’s suits them, allowing for different cultural aspects | [Equality Evidence Review](https://www.skillsdevelopmentscotland.co.uk/media/47777/1329_equality-evidence-review-2021.pdf) | None |  |
|  |  |  |  |

* 1. **Sex** (or gender)

**Context:** Females make up approximately 58% of the workforce in the tourism sector although many of these are working in lower skilled and often part-time roles within the sector. Approximately 40% of senior positions within the sector are filled by women showing there are barriers within the sector to women progressing into senior positions within the sector.

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| The THTDP provides the opportunity for women within the sector to access on-line management, leadership and supervisory training to support them to progress within their careers. | Tourism Skills Investment Plan identifies 58% of the workforce as female.Many women face additional barriers to accessing training opportunities as a result of inflexible working patterns, childcare responsibilities and their concentration in low-paid and part-time work 31. 18 19 32 NOMIS Official Labour Market Statistics (2020) Annual Population Survey | Phase 1 of the THTDP was delivered in 2020/21. Of the 1900 participants on the programme 42% were male and 58% were female.Engagement with the Women in Tourism Group in Scotland by the Tourism Skills Group supporting events and mentoring activity.Strong emphasis within the national tourism strategy Outlook Scotland 2030 on diversity within the workforce. | Scottish Tourism Alliance and HIT Scotland to work with businesses across the sector to ensure equality of access to the programme regardless of gender. Ensure a strong linkage with the Women in Tourism Group to promote and encourage applications to the programme from membership and ensure they promote the programme.Scottish Tourism Alliance and HIT Scotland to work with SDS Sector manager and SDS Equalities team to ensure the correct messages around gender are communicated within the programme and when promoting the programme. Ensure appropriate language and imagery is utilised.On-going monitoring of participant data regarding gender throughout the delivery of the programmeWork with Mar Comms team within SDS to ensure all communications regarding the programme are appropriate with regard to gender.Ensure that the programme providers are fully compliant with equalities legislation with regard to gender. |

* 1. **Sexual orientation**

**Context:** As far as we are aware no data on sexual orientation available in the tourism workforce.Therefore, it is not possible to fully assess whether individuals falling under this protected characteristic face any barriers or discrimination in accessing upskilling/reskilling as part of the THTDP

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| The programme will be promoted across the sector to all businesses and employees within the sector regardless of sexual orientation, |  |  | Promote positive role models from this group in our marketing and via our digital services. |
| If gender options not available on eligibility or application forms, may feel not included | [Stonewall (2020) Shut Out](file:///C%3A%5CUsers%5CBruceia%5CDocuments%5CStonewall%20%282020%29%20Shut%20Out) | Equality monitoring in other programmes is in line with census data capture | Ensure inclusive monitoring forms (including “in another way”) |

1. Assessing impact on other groups

This section is the same as above only considers the impact of groups not covered in the Equality Act (2010), e.g. care experience, carers, socio-economic disadvantage). Add sections as required.

* 1. **Care experience**

**Context:** As far as we are aware no data on care experienced individuals available in the tourism workforce.Therefore, it is not possible to fully assess whether individuals falling under this protected characteristic face any barriers or discrimination in accessing upskilling/reskilling as part of the THTDP

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| Through consultation, some of the key barriers to employment and upskilling for care experienced people identified were:* Lack of qualifications / relevant work experience
* Lack of networks / awareness of opportunities
* Lack of understanding from employers
 | Consultation with care experienced young people and Action for Children / Barnardo’s staff[Equality Evidence Review](https://www.skillsdevelopmentscotland.co.uk/media/47777/1329_equality-evidence-review-2021.pdf) | SDS is a Corporate Parent and undertakes work across other programmes specifically focused on care experienced individualsGuides produced in conjunction with Who Cares Scotland to support learners and providers | Promote positive role models from this group in our marketing and via our digital services.Raise awareness with providers and employers of the needs of care experienced young people and how to support them more effectively |

* 1. **Additional factors**

**Context:** Island/Rurality. Individuals and businesses in Island and rural areas often struggle to access training and development opportunities.

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| The on-line nature of the programme ensures that physical location is not a barrier for participants to access the upskilling opportunities |  | Phase 1 of the THTDP delivered in 2020/21 was delivered to participants across Scotland with considerable take up from individuals and businesses in rural and island communities. | Need to work closely with the Scottish Tourism Alliance and HIT Scotland to ensure that businesses and individuals in island and rural communities are targeted to ensure high levels of participation on the programme. |
| There is a risk that slow connectivity could hamper access to online modules but this is outside of the scope of SDS control |  |  | Ensure modules are developed with connectivity considerations |

**Context:** Ensure equality of opportunity and that no one is left behind due to economic impact of access to digital equipment

| Evidence of positive or negative impact | Source of evidence  | Activity to date  | Further activity required  |
| --- | --- | --- | --- |
| Digital Poverty – negative impact  | Scottish Government COVID response | Liaison with Connecting Scotland  | Connecting Scotland to gain access to equipment supported by Scottish Government<https://connecting.scot/>Also if appointed provider is a college SFC awarded additional funding to colleges to assist individuals with Digital poverty on a case by case basis |

1. **Action Plan**

The SRO is responsible for all actions. Throughout the EqIA process you will have identified actions which need to be taken forward. These actions should be added to your workplan and Risk Register where appropriate. Some examples of action you may have identified throughout the EqIA process are:

* Build in equality monitoring / evaluation
* Make amendments to your policy
* Build in additional support mechanisms to your policy if required
* Consult with staff, customers or stakeholders
* Involve staff/customer groups in developing aspects of your policy

| **What is the action?** | **Which group(s) does it relate to?** | **What is the anticipated outcome?** | **What method is used to measure it?** | **Timescale** |
| --- | --- | --- | --- | --- |
| Analyse the Ekosgen evaluation of the THTDP Phase 1 (delivered in 2020/21) to identify any issues and recommendations relating to equalities or access to the programme for any of the groups identified in the Equality Act | All groups identified in the equality act | Identification of any issues that need to be addressed in the THTDP 2021/22 that need to be addressed and agree solutions with providers | End of programme evaluation report | October 2021 |
| Ensure equality consideration are built into procurement process including Gaelic translation in comms | All groups | Inclusion is at the forefront of the commissioning process and therefore bidders will be clear on expected outcomes.  | Bid submission and scoring methodologies | October 2021 |
| SDS Tourism Sector manager and SDS Equalities team to engage with the Scottish Tourism Alliance and HIT Scotland to ensure they are fully compliant with all equality legislation  | All groups | Compliance within the programme regarding equalities legislation | On-going monitoring of the programme delivery, participant feedback and end of programme evaluation report | October 2021 and on-going to March 2022 |
| On-going analysis of participant data to identify any potential issues regarding accessibility to the programme from groups covered by the equality act | All groups | Identification of any potential issues of under-representation amongst any of the groups | Analysis of participant data, participant feedbackFIPS | October 2021– March 2022 |
| Work with the Scottish Tourism Alliance and HIT Scotland to ensure all marketing and comms materials relating to the project are including appropriate messaging and inclusive language and imagery. | All groups | All marketing and comms materials used within the customer journey are compliant with good practice and legislative requirements around encouraging participation from all groups. | Monitoring of all comms and marketing materials utilised on the programme and monitoring of uptake amongst all groups | October 2021 – March 2022 |
| An awareness session for HIT Scotland and Scottish tourism Alliance regarding equalities and diversity as part of the project inception meeting. Also signpost providers to SDS resources on equality and diversity | All groups | Greater awareness by providers of their responsibilities and our requirements re. equality and diversity and awareness of support available. |  | Inception meeting – October 2021 |

1. SDS Equality Evidence Review 2019 and the Scottish Government’s A Fairer Scotland for Disabled People Plan [↑](#footnote-ref-2)
2. SDS use the broader definition of ‘Trans’, to include trans women and men, non-binary and cross-dressing people. It is recognised that intersex is separate, and that intersex people may identify as men, women or non-binary. [↑](#footnote-ref-3)